



Harmony Valley Farm

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Arthur Neal, Director, Program Administration
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Dear Mr. Arthur Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program Sunset Review, Docket number TM-04-07.

In my more than 33 years of experience farming vegetables organically, I have found the use of several of the synthetic substances up for review to be very necessary. It would be a substantial loss if we could no longer use the following substances in crop production:

205.601 (a:4) Hydrogen Peroxide: We prefer the stabilized form, Peracetic Acid, as a disinfectant.

205.601 (b:2:ii) Plastic Mulch and Covers: These are absolutely necessary for heat-loving crops here in a cooler climate. I have researched and found no satisfactory alternative. Use of plastic mulch, (especially reflective mulch) and covers reduces our need for other insect control methods including spraying. We are able to completely remove the plastic mulch without any remaining in the soil.

205.601 (e:2) Boric Acid: This is a safe, effective deterrent to structural ant pests.

205.601 (e:7,8) Soaps, Insecticidal, Sticky traps/barriers and 205.601 (f) Pheromones: We find these useful for some insect problems. Sticky traps as a monitoring tool do not contact food or soil; nor do the pheromones we use to monitor insects. This monitoring to determine the presence of certain insects, i.e. corn earworm moths, is an essential part of our insect control program.

205.601 (g:2) Vitamin D-3: This is one of the only ways we've found to control rats, because they are very difficult to trap.

205.601 (i:1) Coppers, fixed: Copper hydroxide & copper sulfate are very necessary to control leaf diseases. We farm in a very moist valley; in a wet year our losses from leaf diseases could be very severe if we could not use copper products. We take many steps to minimize the accumulation of copper in the soil. We rotate crops that receive a copper foliar. We test for copper in our yearly soil tests, and after many, many years of using copper, we still see copper deficiency in most of our fields. We also use copper sulfate as a micronutrient amendment to amend copper deficiencies based on soil tests.

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205.601 (i:4) Hydrogen peroxide: Another necessary plant disease control substance.

205.601 (i:5) Lime sulfur: A leaf disease control, necessitated by our moist situation, that allows us to be somewhat competitive with drier climates.

205.601 (j:6:i,ii) Micronutrients including soluble boron products; sulfates of zinc, copper, and manganese: We use these to correct soil deficiencies documented by yearly soil testing.

205.601 (j:7) Liquid fish products – also necessary to correct soil deficiencies.

205.601 (m:1) EPA List 4 – Inerts of Minimal Concern: Many of the products we use do include Inerts of Minimal Concern; we'd like them to continue to be allowed.

In summary, it is my view that the above substances should continue to be allowed for use in organic production. Prohibiting them would be extremely detrimental to us as growers.

Sincerely,

Richard De Wilde
Farmer and Owner
Harmony Valley Farm